UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

U.S. DISTRICT COURT DISTRICT OF NEW JERSEY

2024 DEC 16 A 9:21

Mike Kulowski

COMPLAINT

versus

DEMAND FOR JURY TRIAL

Environmental Protection Agency, Federal Bureau of Investigation, Port Authority of New York and New Jersey. OSHA Parsippany Area Office, Immigration and Customs Enforcement, National Construction Rentals, Dollar Tree, Inc., Civic Plus LLC, Peter Baker, Hudson County, City of Jersey City, Hudson County Superior Court, Steven Fulop, Warren K. Curtis, James Shea, Edgar Martinez, Raymond Meyer, Jacob Hudnut, Mikhaeil Shehata Mehany, Sujey Sanchez, Karen DeSoto, Christopher Vasquez, Onkar Sigh, Inderjit Singh, Esther Suarez, Borat Kuldeep Kumar, Angela Gingerelli aka The Fat Legal Bimbo, Arvinder Minhas aka Dumb Criminal Number 2, Minions 1-10, Limited Liability Corporations 1-50, Oscar Castro, Nicken Parekh, Stuart Rabner, Phil Murphy, Robert I. Unanue, Mitzy Galis-Menendez, Nesle A. Rodriguez, Monte Zucker, New Jersey Attorney General, John Metro, Silva Construction and Demolition Inc., John Hallanan, Carl Abad.

I. JURISDICTION

1. This Court has jurisdiction under 28 USC 1331 and 28 USC 1343 and 28 USC 1332 (diversity of citizenship and amount in controversy).

II. VENUE

2. Venue is proper pursuant to 28 USC 1391 because injury occurred and Defendants operate within Court's jurisdiction.

III. PARTIES

- 3. Plaintiff M. Kulowski is a resident of Defendant Jersey City.
- 4. Environmental Protection Agency is an agency of the United States.
- 5. Federal Bureau of Investigation is an agency of the United States.
- 6. Port Authority of New York and New Jersey is a corporation owned by states of New York and New Jersey.
- 7. OSHA Parsippany Area Office is an agency of the United States which has jurisdiction over workplaces run by various Defendants in Hudson County, NJ.
- 8. Internal Revenue Service is an agency of the United States.
- 9. Immigration and Customs Enforcement is an agency of the United States.
- 10. Civic Plus LLC is a corporation which serves as Jersey City contractor (vendor) who provides technical assistance to citizens in filing complaints over the Internet. It is headquartered in Manhattan, Kansas.
- 12. County of Hudson (Hudson County) is a subdivision of the state of New Jersey.
- 13. Hudson County Superior Court, aka Superior Court of New Jersey, Hudson Vicinage.
- 14. City of Jersey City ("Jersey City") is a municipal corporation.
- 15. Peter Baker was an employee of Defendant Jersey City in position of a corporate counsel. He is being sued in personal capacity.
- 16. Steven Fulop is an employee of Defendant Jersey City in position of a mayor. He is being sued in his personal capacity.
- 17. James Shea is an employee of Defendant Jersey City in position of a Director of Public Safety. He is being sued in his personal capacity.
- 18. Edgar Martinez is an employee of Defendant Jersey City in position of a policeman. He is being sued in his personal capacity.
- 19. Jacob Hudnut aka Jake Hudnut is an employee of Defendant Jersey City in position of municipal prosecutor. He is being sued in his personal capacity.

- 20 John Hallanan is an employee of Defendant Jersey City in position of Custodian of Records. He is being sued in his personal capacity.
- 21. Karen DeSoto is an employee of Defendant Jersey City in position of municipal court judge. She is being sued in her personal capacity.
- 22. Surjey Sanchez is an employee of Defendant Jersey City in position of assistant municipal prosecutor. She is being sued in her personal capacity.
- 23. Raymond Meyer is an employee of Defendant Jersey City in position of a Construction Coded Official, who manages about 6 building inspectors. He also enforces NJ Uniform Construction Code. He is being sued in his personal capacity. He is being hereafter referred to as "building inspector";
- 24. Christopher Vasquez is an employee of Jersey City Police with badge number 3023. He is also a low level mob enforcer employed by Defendant Borat Kuldeep Kumar with permission of James Shea, Edgar Martinez and Steven Fulop. He is being sued in his personal capacity.
- 25. Warren K. Curtis is an employee of Defendant Jersey City in position of a Zoning Officer. He is being sued in his personal capacity.
- 26. John Metro is an employee of Defendant Jersey City in position of business administrator. He is being sued in his personal capacity.
- 27. Onkar Sigh, is an Indian national and professional fraudster operating out of 37 Imperial Court, Monroe, NJ house. He engages in housing development and construction mainly in Jersey City. He runs numerous sham LLCs.
- 28. Inderjit Singh is a wife and co-conspirator of Onkar Sing and operating out of same Monroe, NJ house.
- 29. Arvinder Minhas aka Dumb Criminal Number 2, is a fraudster, perjurer and a construction contractor active in Hudson County. He is a co-conspirator of Onkar Singh. He runs at least one sham LLC on his own.
- 30. Borat Kuldeep Kumar is a twice convicted fraudster and a construction contractor active in Jersey City. He operates sham LLCs R & J Builders LLC and Euro Concrete. He is also a Jersey City official.
- 31. Minions 1-10 are individuals who are business partners and employees of Onkar Singh who are active in construction business in Hudson County. Names to be determined via Discovery.
- 32. Limited Liability Corporations 1-50 are corporations involved in building development and construction in Hudson County. Names to be determined via Discovery.
- 33. Oscar Castro is an organized crime individual who operates Castro Framing Contractor LLC out of his residence in Belleville, NJ. He works at various construction sites in Hudson County and employs almost exclusively illegal aliens/slave laborers, defrauding IRS and NJ Treasury in the process.
- 34. Nicken Parekh is an individual who runs four LLCs out of Jersey City and is engaged in development

and housing construction in Hudson County. On occasion, he is a business partner of Onkar Singh.

- 35. Esther Suarez is an employee of Hudson County in position of a county prosecutor. She is being sued in her personal capacity.
- 36. Angela Gingerelli aka The Fat Legal Bimbo, is an employee of Hudson County in position of assistant county prosecutor. She is being sued in her personal capacity.
- 37. Stewart Rabner is an employee of the State of New Jersey in position of Chief Justice. He is being sued in his personal capacity.
- 38. Phil Murphy is an individual in position of a governor of the State of New Jersey. He is being sued in his personal capacity.
- 39. New Jersey Attorney General is an office of chief law enforcement officer in New Jersey.
- 40. Mikhaeil Shehata Mehany is psychopath and an illegal alien residing in New Jersey and is a beneficiary of Steven Fulop Jersey City and Phil Murphy State of New Jersey "Sanctuary" City/State policies.
- 41. Robert I. Unanue is a CEO and shareholder of Goya 75th Urban Renewal Co. LLC, which obtained tax abatement from Jersey City for development of a large warehouse at 360 County Road in exchange for hiring local residents during construction and post construction. He renegaded instead and employed illegal aliens en mass, defrauding Jersey City, IRS and New Jersey Treasury in the process.
- 42. National Construction Rentals is a Nevada corporation headquartered in Mission Hills, California, and is renting and installing temporary fences for construction sites in Hudson County, NJ, including to Borat Kuldeep Kumar.
- 43. Dollar Tree, Inc. is a Virginia corporation operating a retail store at 3000 Kennedy Blvd. in Jersey City, NJ, which as corporate policy uses public streets and public sidewalks as private loading docks, violating ADA in the process.
- 44. Hudson County is a corporation and a subdivision of the State of New Jersey.
- 45. Hudson County Superior Court is a corporation and a local branch of New Jersey government.
- 46. Mitzy Galis-Menendez is an employee of Hudson County in position of a judge and also an organized crime (RICO) enforcer hired by Borat Kuldeep Kumar to silence Whistleblower M.Kulowski. She is being sued in her personal capacity.
- 47. Nesle A. Rodriquez is an employee of Hudson County in position of a judge and also an organized crime (RICO) enforcer hired by Borat Kuldeep Kumar to silence Whistleblower M.Kulowski. She is being sued in her personal capacity.
- 48. Silva Construction and Demolition Inc. is a New Jersey domestic corporation based in Newark, NJ, involved in years long criminal demolition and asbestos hauling from Onkar Singh Defendants construction sites. Also from other sites in Hudson County.

49. Carl Abad was a municipal court judge a co-conspirator of Borat Kuldeep Kumar. He is being sued in his personal capacity.

IV. STATEMENT OF FACTS

- 50. This action involves several claims and mainly pertains to biggest tax racket in New Jersey history, an Indian fraudster, crooked judges, bizarre way of a cover-up of asbestos dumping upon children and a retired plumber turned private building inspector. It also includes other claims pertaining to assaults, insurance frauds and tax frauds and civil rights abuse.
- 51. For the purpose of the instant action, Onkar Singh Defendants refers to Onkar Singh, his wife Inderjit, Borat Kuldeep Kumar, Arvinder Minhas, Minions 1-10, Corporations 1-50, Nicken Parekh, and Oscar Castro, Silva Construction and Demolition and National Construction Rentals.

V. CLAIMS

52. Plaintiff incorporates by reference all of the paragraphs above. All paragraphs below constitute an entire body.

Count 1

Breach of Contract.

- 53. Onkar Singh is an Indian national and a mega-fraudster operating in New Jersey. He surpasses Eliyahu Weinstein, currently indicted in this Court for a third mega-fraud of his.
- 54. Between about 2016 and the present time Defendant Singh entered into multiple written contracts with the Defendant City of Jersey City. Defendant Singh and his wife used numerous sham LLCs to conceal their involvement. Also, to conceal an international investment scam catering to fellow Indian nationals located mainly in India. For development of 3224 Kennedy Blvd., Jersey City, they used LLC registered at 222 Duncan Ave. Jersey City, which they claimed was "mom and pop" local small business "headquartered" there. Plaintiff Kulowski' investigation of Fulop's corruption revealed that it is a separate check cashing business, which just happens also rents private mailbox to the Singhs. Both actually run their racket out of their residence in Monroe, NJ.
- 55. As investments grew, Defendant Singh opened multiple sham LLC, which he uses to defraud Jersey City, New Jersey and United States.
- 56. Over the years, Singh Defendants obtained multiple public subsidies in the following forms:
- Variances from Jersey City zoning laws allowing expanded developments otherwise not permitted. Variances multiplied property values.

- Property tax abatements (aka tax exemptions) from Defendant Jersey City.
- Public street closures, public sidewalks closures (both from Jersey City and Hudson county) for exclusive private use. This multiplied profits. This is a precedent setting claim.
- Illegal waivers by corrupt building inspector Defendant Raymond Meyer of compliance requirement with New Jersey Uniform Construction Code and other construction related laws. This is a precedent setting claim.
- Illegal waivers by corrupt building inspector Defendant Raymond Meyer of compliance requirement with US DOT and NJ DOT regulations of construction vehicles. This is a precedent setting claim.
- Illegal waivers of compliance requirement with American With Disabilities Act during construction activities. This is a precedent setting claim.
- Illegal waivers of OSHA compliance by Raymond Meyer. This is a precedent setting claim.
- 57. Value of these public subsidies is tangible and runs into millions of dollars per year.
- 58. In exchange for above subsidies, the Defendant Singh and his wife voluntarily agreed to give priority in employment to local residents during construction and post construction. That includes Plaintiff M.Kulowski.
- 59. Onkar Singh Defendants conspired to defraud Jersey City, its citizens, and numerous New Jersey and United States agencies and insurance providers.
- 60. Not a single local resident were ever hired (including Plaintiff Kulowski). Any local hire, if occurred, was due to unavoidable circumstances.
- 61. Onkar Singh Defendants conspired to engage in human trafficking across state lines and gave preference to illegal aliens. Directly and via their subcontractors. Illegal aliens are abused and paid below minimum wage and no overtime.
- 62. Onkar Singh Defendants have policies to employ illegal aliens who are prohibited to work in USA.

Count 2

Unfair competition by Onkar Sigh Defendants.

- 63. For the purpose of this civil action, Plaintiff Kulowski is both a prospective employee and a competitor construction worker. Unfair competition exist when a competitor obtains an advantage by unethical, illegal and criminal acts. This claim is limited to publicly subsidized projects in Hudson County, which amounts to about 95% of total construction projects in Jersey City (both construction and post construction).
- 64. Onkar Singh Defendants used the following methods to displace Plaintiff Kulowski and thousands

of local residents from Jersey City workforce:

- Human trafficking across state lines by doing themselves and/or arranging others to do this.
- Hiring themselves and/or hiring subcontractors who employ illegal aliens and who are expressly prohibited being present and working in USA.
- Perpetrating wage theft from workers whom they use. Defendant Singh co-conspirator Defendant Borat Kuldeep Kumar is currently under 4 separate stop work orders from New Jersey Department of Labor for wage theft, as well as under identical investigation by National Labor Relations Board in Newark, NJ.
- Perpetrating routine and multiple car insurance frauds by registering numerous commercial construction vehicles as personal. Also, facilitating their contractors doing same. Many fake registrations and fake insurance policies are from faraway states including Georgia and Texas.
- Making fraudulent statements to Defendant Jersey City purporting that they complied with contracted mandate of hiring local residents first. That includes multiple cases of mail fraud and wire fraud. Defendant Singh's co-conspirators were Charles Harrington (a crooked lawyer) and Steven Fulop (mayor) and Peter Baker (City lawyer).
- Perpetrating massive workers compensation insurance frauds by not paying appropriate taxes thereof (illegal aliens cannot be insured in New Jersey operated scheme due to lack of social security numbers).
- Perpetrating massive unemployment insurance fraud by not paying appropriate taxes thereof.
- Perpetrating massive social security fraud by not paying social security taxes.
- Committing and allowing to be committed multiple major OSHA violations at construction sites, thereby "saving" millions of dollars in mandatory OSHA compliant business expenditures.

Count 3

Jersey City gross negligence and 42 USC 1983 claim against Jacob Hudnut, Sujey Sanchez, James Shea, Steven Fulop, and Raymond Meyer for Equal Protection under 14th Amendment violations by waiving wholesale any noise restrictions to crooked contractors and allowing unlimited noise pollution.

- 65. Defendant Jersey City recognizes noise pollution as health hazard and has Chapter 222 specifically stating so. Yet, entire noise pollution enforcement is a sham.
- 66. Since 2016 until present said Defendants illegally allowed unlimited noise pollution violations to occur during construction activities of Onkar Singh Defendants and entire construction activity throughout Jersey City altogether. Such a policy is illegal and violates City's own ordinances. Also, it violates Equal Protection by giving unlimited priority to crooked contractors over Plaintiff and his fellow Jersey City residents. No citations for noise violations were ever issued for decades, not a single

stop work order issued. Noise from Defendants construction sites also always exceed City's own Chapter 222 limits and OSHA norms for workers present, which are a cause to issue stop work order by itself. To facilitate bribes to Fulop Shea, Meyer and others, City has no protocol and no means to enforce restrictions. City possesses not a single instrument to measure violations. When Plaintiff filed numerous formal complaints, Defendant Meyer, in exchange for bribes, falsified records and took no action. Borat Kuldeep Kumar and Arvinder Minhas are exceptionally prolific and arrogant abusers.

Count 4.

Jersey City, Steven Fulop, James Shea, Jacob Hudnut, Sujey Sanchez and Port Authority gross negligence by allowing assaults to occur.

67. As a result of Fulop's Sanctuary City policy, whole menagerie of garbage and criminal people from Third World countries flocked to Jersey City, bringing their garbage and criminal behavior with them. That includes thousands of illegal aliens, such as one Sakir Akkan, currently awaiting trial in New York state capital for child rape (he could not have done it without obtaining a NJ driver license and handout money for personal car thanks to Defendant Murphy – NJ governor).

Assault # 1

68. In December of 2023 Plaintiff was between his photography sessions at the National Gallery in Washington DC and Boston's Fine Arts Museum, when he stopped in Jersey City to change clothes. At PATH train station he was attacked by a stranger, the Defendant Mehany. This Defendant is an illegal alien from who is not legible to be let into USA at Point of Entry due to being a deranged psychopath and retarded. This defendant was trespassing at the PATH train station by not paying a fare (which is his garbage behavior brought from his Third World Country and he wants us to put up with it on account of Defendants Fulop's and Murphy's Sanctuary City/State Policy). He was illegally carrying an e-bike and attempted to use an escalator full of people, when told by Plaintiff Kulowski this was illegal and dangerous. Defendant Mehany is obviously too retarded to foresee an injury to multiple people should 100 lbs + bike fall while being carried on escalator full of 50 people. Defendant became outraged and verbally abused Plaintiff in broken English language. He then followed Plaintiff informing him by shouting uncontrollably that he intends to kill him. Plaintiff kept retreating while Defendant kept closing in shouting his deranged threats. Plaintiff was forced by this Middle East Terrorist to defend himself by aiming to knock him out by punching straight in the nose. Defendant Mehany in split second retreated and ended up with only slightly cut lip. This proves that Defendant was only inches away from Plaintiff when he was retreating from a blow. Plaintiff was afraid Defendant had a knife on him and will carry stated threat to kill him. Plaintiff is a White American male, while Defendant is an Arab who refuses to integrate to Western society, with obvious disdain for Whites (and obviously Blacks, Latinos and women as well). There is a large contingent of Arab ethnicity people in Jersey City who are law abiding and productive members of our society.

Enter Fulop's and Murphy's Woke ideology.

69. Instead of prosecuting Middle East Terrorist, the Defendant Mehany for attempted murder, the Defendant Hudnut and Sanchez prosecuted Plaintiff instead. According to Hudnut's and Sanchez's "legal" standard of self defense, Plaintiff had to be murdered by an assailant first in order to trigger self

defense legal mechanism.

70. Port Authority is liable for allowing Mehany's assault upon Plaintiff by not enforcing strict prohibition on e-bikes on PATH trains and fare evaders. Had Port Authority enforced own written polices, assailant Mehany would not be present at PATH train station.

Assault # 2

- 72. People from India who refuse to integrate into Western society flocked to Plaintiff's Sparrow Hill area in response to Fulop's Sanctuary Policy (those are not to be confused with intelligent people from India who integrate).
- 73. As a result, such people force upon the Plaintiff and his fellow citizens their garbage behavior, starting with rampant defecation on public sidewalks.
- 74. In addition, trash is being dumped on public streets just like in their own slums back home.
- 75. Plaintiff made numerous complaints about such people illegally parking cars on public sidewalks en mass and forcing pedestrians onto busy and dangerous street pavement. When Plaintiff took picture of one such incident in 2024, violator stalked Plaintiff and assaulted, causing Plaintiff to deploy pepper spray. Defendant stated that he intends to kill Plaintiff, and kept continue to charge despite of 4 series of pepper spray deployment and being temporary blinded at one point.

Assault #3

76. In 2024 Defendant Borat Kuldeep Kumar hired an unlicensed subcontractor for illegal work at 121 Carlton and 2966 Kennedy. Plaintiff discovered an insurance fraud involving commercial vehicle registered as private and having no 3 inches tall business name on doors as mandated by NJSA 39:4-46. This always comes along with employment of illegal aliens and tax frauds with it. When Plaintiff was documenting on public street and across construction site Borat's subcontractor committing numerous frauds, he was assaulted by said subcontractor who attempted to steal Plaintiff's camera. This assault occurred due to Hudnut and Sanchez practicing Woke ideology and protecting illegal aliens employed by Borat Kuldeep Kumar.

Count 5.

Defamation and 42 USC 1983 claim for civil rights violation by Hudson County Superior Court, Jersey City, Onkar Singh Defendants, Mitzy Galis-Menendez, Nesle A. Rodriquez, Christopher Vasquez and Defendant Rabner.

- 77. No one can be found guilty of a crime that is known to have never occurred (a hoax). Plaintiff caught Onkar Singh Defendants illegally removing and hauling asbestos at 3224 Kennedy and exposing children at Middle School 7 to it on days on end. They also exposed illegal aliens/slave laborers of asbestos contractor from Irvington, NJ. As a result, they caused cancer cluster. Whistleblower M.Kulowski caused site to be shut down. Twice.
- 78. In order to silence Plaintiff, Borat Kuldeep Kumar hired Defendants Suarez, Gingerelli, Galis-

Menendez and Nesle A. Rodriquez and had them secretly indicted Whistleblower for made up crimes (hoax) and consequently convicted. Defendant Hudson County judges acted in conspiracy with other Defendants including Gingerelli and Suarez. Defendant Hudson County judges coached Minhas to perpetrate a hoax. Plaintiff ruined a hoax by activating video option on his camera and recording the event. Video was introduced as evidence, confirmed as authentic by self proclaimed "victim" Minhas. Also defendant Hudson County judges confirmed video as true. Short video shows merely Plaintiff walking on public sidewalk recording construction site through the chain link fence. Not expecting Plaintiff having ready camera at all times on him, Suarez and Gingerelli coached Minhas to made up a story of assault, bruises and ripped shirt, what he reported to police. Minhas however got excited and made 911 emergency call to Jersey City police, while Plaintiff camera was rolling, thus all time of event is accounted for, and hoax was exposed.

- 79. Corrupt Hudson County judges ignored video and correctly relied on corruption of NJ Chief Justice Defendant Rabner.
- 80. Plaintiff's status as a criminal, which is based on a hoax constitutes a defamation. There is no statute of limitation as long as this status officially exists on record.
- 81. In addition, having Plaintiff declared a criminal based on a hoax constitutes Civil Rights abuse under 18 USC 241.
- 82. Defendants Hudson County and Jersey City judges have no immunity, since a criminal act is expressly forbidden by law and cannot be conceivably a part of discretionary judicial duties. Accordingly, Defendant Hudson County judges must pay cost of defense on their own, not by taxpayers.
- 83. Minhas, Singh and Borat rented from Martinez a patrolman Christopher Vasquez as mob enforcer, who filed several fake complaints against Whistleblower, including for "trespassing". Vasquez was not even in the area when Whistleblower took pictures of construction site from public sidewalk.

Count 6

Jersey City, Steven Fulop and James Shea gross negligence for allowing 60 000+ illegal dwellings in Jersey City.

- 84. As a result of Fulop's Sanctuary Policy and Fulop's Tax Abatement Racket, an increase of illegal dwellings skyrocketed from 20 000 to at least 60 000. In many cases there are dozens of people cramped in basements, attics and garages. In 2016 Plaintiff brought to attention of City Council and Defendant Fulop the slum at 37 Cliff Street, a Cape Code style single family house converted to 3 family (attic and basement with no fire exits at all - death trap for dwellers and firefighters). people live in garages and defecate on public sidewalks (mainly of Indian origin). All such illegal dwellings are in violation of City's own zoning laws. Defendant Fulop refuses to address this issue and allows Defendant Warren K. Curtis (zoning officer) and Raymond Meyer (Construction Code Official) to falsify records to hide these massive and rampant zoning and construction violations.
- 85. Such illegal dwellings are mostly death traps for dwellers and firefighters. 145 Carlton Ave. Jersey City is a prime example of refusal to address the issue for years (all Plaintiff's complaints were illegally

not addressed and closed without mandatory inspections).

Count 7

- 42 USC 1983 claim against Warren K. Curtis for violating Equal Protection and Due Process under 14th Amendment by allowing illegal driveways, gates and fences.
- 86. Defendant Jersey City employee Warren K. Curtis routinely "legalizes" illegal driveways. Curtis does so by fraudulently stating in records that illegal driveways are "pre-existing". He provides no legal basis for what date they "pre-exist" and why would his imaginary date be legal in the first place. In many cases driveways are obviously illegal because the only way they accommodate a car is to obstruct a public sidewalk (also violating ADA in the process).
- 87. In addition to "legalizing" illegal driveways, Defendant Curtis falsifies public records by fraudulently closing complaints without investigating them. This includes illegal dwellings and private fences and gates placed on public sidewalks. No private gate can be subject to open on public right of way (and also violate ADA in the process as well).
- 88. There are 3 examples of Fulop's massive corruption, where private people erected private gates fencing off public entire streets and renting out public property for profit. These are West end of Cottage Street and West end of Skillman Ave. Fire hydrants there are fenced off as well. "No trespassing" signs were erected. Also, entire City park in front of 2985 Kennedy Blvd. is being used as private parking lot and rented for profit.
- 89. In addition to Equal Protection violations, Defendant Curtis violates Plaintiff Due Process by having complaints investigated and disposed of according to City's own laws.

Count 8

- 42 USC 1983 claim against James Shea, Steven Fulop, Raymond Meyer, Monte Zucker for violating Equal Protection and Due Process under 14th Amendment by allowing rampant illegal sidewalk and street closures.
- 90. Every inch of Jersey City streets and sidewalks is regulated by city, county and state laws. City employs worker (Zucker) specifically to handle paperwork for closures. Despite of that, entire enforcement is a sham and City allowed Onkar Singh Defendants to close multiple streets and sidewalks at will for even up to 2 years! Borat Kuldeep Kumar is so arrogant, that upon making illegal sidewalk/street closure and thus being a trespasser himself, posts "no trespassing" signs.
- 91. Jersey City Defendants also allow permits for streets and sidewalks closures even for the days when City own ordinance prohibits construction work (night time and weekends/holidays).

Count 9

- 42 USC 1983 claim against Jacob Hudnut and Surjey Sanchez for violating Due Process under 14th Amendment by malicious prosecution.
- 92. Defendant Hudnut is not fit to be a municipal prosecutor. He was appointed solely in exchange for personal sexual favors to Defendant Fulop (mayor) (he is not the only one). In compliance with Woke ideology and Sanctuary City policy, Hudnut proceeded to prosecute an actual victim of an assault and attempted murder, this Plaintiff M. Kulowski
- 93. Defendants Hudnut and Sanchez are so arrogant and Woke delusional, that when "trial" was to be postponed, they demanded judge to order an actual victim M. Kulowski to reimburse Middle East Terrorist Mehany lost wages for that day. That is despite of being an illegal alien prohibited to be present, let alone work, in the USA.
- 94. Defendants Hudnut and Sanchez knew that assault upon M. Kulowski was recorded on numerous CCTV cameras at the train station and at different angles. They knew these recordings prove that M. Kulowski was a victim and negates and ruins Hudnut's entire case. This was raised at the municipal court hearings. Yet, Defendant Hudnut committed a fraud upon a municipal court fraudulently claiming that there exist no such CCTV footage. Sanchez made an inquiry with Port authority only after two previous attempts at sham trials.
- 95. I addition, Defendants Hudnut and Sanchez fraudulently stated to municipal court that they provided M.Kulowski discovery in form of body camera videos from Port Authority policemen present at the incident. That was a lie. Such a lie to court constitutes Due Process violation under 14th Amendment.

Count 10

Americans With Disabilities Act violations by Jersey City, James Shea. Steven Fulop, John Metro, Raymond Meyer, Monte Zucker and Hudson County.

- 96. Defendants routinely violate their duties by not enforcing ADA upon Onkar Singh Defendants and crooked contractors at large during construction activities. Defendant Raymond Meyer even explicitly stated to Plaintiff that ADA (and OSHA) compliance is exempt from his duties as building inspector.
- 97. ADA violations include illegal closures of entire street blocks with no any ADA accommodations.

Count 11

- FBI negligence by not investigating Defendant Hudson County and Jersey City judges and Onkar Singh Defendants, Suarez, Gingerelli (The Fat Legal Bimbo), Fulop, Shea and Meyer.
- 98. FBI duty is to investigate crimes under United States Code, just like they did with Onkar Singh's fellow mega-fraudster Eliyahu Weinstein and Fulop's fraudster Philip Zacche (former chief of police). However, FBI is negligent by not providing to Newark Field Office sufficient manpower and finances to perform this task. This results in local criminals' rampant impunity and them openly engaging in

organized crime. That includes Jersey City and Hudson County judges. By extension, also criminal activity of Rabner.

Count 12.

EPA negligent by allowing Jersey City violating consent decree from this Court and keeping secretly violating Clean Water Act.

- 99. Plaintiff M.Kulowski's investigation of Fulop's corruption revealed that in order to accommodate rapid housing construction developments, Defendant Jersey City, Fulop, and Peter Baker (then City corporate counsel) routinely falsified records claiming that the new developments reuse old sewer connections. For instance, building at 253 Academy is a hotel disguised as an apartment building with about 80 studios. According to public records, this hotel re used previous single family home 4 inch sewer pipe connection, which is preposterous. This scam allows to fool EPA, by removing new development connections from rolls to be counted for CWA consent decree compliance calculations. Defendant Singh is one of the beneficiaries of such a scam, including at 3224 Kennedy, 125 Lake and other properties in Jersey City.
- 100. Defendant Fulop hides from EPA actual number of illegal dwellings and dwellers in the City. Number more then triple during his tenure, yet, this is entirely hidden from EPA and from this Court. This is the reason records of Plaintiff's complains are falsified, to make it appear illegal dwellings are irrelevant exceptions.

Count 13

- 101. OSHA Parsippany Area Office is negligent by not prosecuting OSHA violations reported by Plaintiff M.Kulowski. OSHA also violates Due Process under 5th Amendment doing so.
- 102. Under current policy, Defendant OSHA only prosecutes cases where its own inspector witnesses a violation. Over the years, Plaintiff submitted numerous complaints and provided documentation, but OSHA refused to prosecute it. OSHA has subpoen powers and can do follow up investigation by demanding documentation directly from employer to cross reference an incident. Plaintiff caught Onkar Singh Defendants illegally removing asbestos on numerous projects including 3224 Kennedy, 121 Carlton, 221 Liberty, 138 Lake. Defendant Parekh illegally removed asbestos at 121 Lake. Under current policy, these violations do not qualify for prosecution by OSHA despite of Plaintiff documenting it.

Count 14

Jersey City, James Shea, Steven Fulop and Raymond Meyer are grossly negligent by not requiring and not enforcing Safety Mitigation Plans on Onkar Singh Defendants construction sites. This also violates Equal Protection and Due process under 14th Amendment.

103. Such an arrangement is maintained to facilitate bribes to these individual Defendants. Onkar Singh Defendants are allowed to risk health and lives of their slave laborers and members of the public,

including Plaintiff.

Count 15

Jersey City is grossly negligent by allowing Fulop to run a scam stealing money from Jersey City budget by having his friends hold positions of Deputy Chief of Police.

104. There are about 16 with total police force of around 1100, whereas New York City Police has 15 Deputy Commissioners with force of 35 000. Each Jersey City Deputy Chief of Police is secretly awarded 180 sick days on first day on job, what amounts to over half a million dollars. City cannot legally maintain this scam, because it is on Abbott list (Abbott vs Burke). Jersey City claims an acute impoverishment and its School District is being subsidized by all other municipalities throughout New Jersey despite of having own budget of over \$ 1 billion dollars! Also, while "impoverished", Jersey City awarded millions of dollars in tax abatements subsidies.

105. One of Deputy Chief of Police is Defendant Martinez, who was awarded position for harassing Plaintiff M.Kulowski as mob enforcer, when Whistleblower exposed Onkar Singh Defendants dumping asbestos upon children at Middle School #7. Martinez also was caught protecting illegal Chinese bus depot in apparent bribery scam. That scam was single handedly shut down by Plaintiff, thus depriving Martinez income for virtually doing nothing (driving around and pretending he never saw illegal activity occurring daily in front of his eyes).

Count 16

Defendant Oscar Castro engages in unfair competition and tax fraud.

106. Castro is operating Castro Framing LLC, and relies exclusively on illegal aliens, wage theft, tax frauds, car insurance frauds, NJ workers compensation insurance fraud, NJ unemployment insurance fraud and social security payroll tax fraud. Castro routinely violates OSHA as his business model. Castro is a frequent subcontractor for Onkar Singh Defendants. As such Castro causes Plaintiff's injury by making him unable to compete for construction jobs on the open labor market.

Count 17

Defendant Rabner is incompetent and grossly negligent by allowing New Jersey courts to use "hate crime" statute NJSA 2C:16-1 to harass political opponents of his Woke ideology. Also, Rabner violates Equal Protection under 14th Amendment by prioritizing rights of self proclaimed "victims".

107. Defendant Rabner is a New Jersey equivalent of Roland Freisler.

108. In a frantic attempt to silence Whistleblower M.Kulowski for exposing dumping asbestos on children at Middle School 7, Onkar Singh Defendants, Esther Suarez, Angela "The Fat Legal Bimbo" Gingerelli and Crooked Hudson County judges had him secretly indicted for "hate crime". For this purpose Defendant Arvinder Minhas was coached and committed perjury claiming to be a "victim" of a "hate crime". Minhas lied under oath that Plaintiff M.Kulowski said to him "go back to your country dot head". It is preposterous that such a statement (even if not a hoax) would be considered a criminal

- act. Moreover, with Rabner's protection, it is qualified as "bias intimidation".
- 109. Under the First Amendment, there exist no such crime as "hate crime". Nullum crimen sine lege. Law must be defined. According to Rabner, as long as any snowflake declares to be "intimidated". there exists a high crime, despite of not even vague description what exactly such "bias intimidation" is and why a snowflake has superior rights then a person exercising free speech under First Amendment.
- 110. On a separate occasion, Defendant Rabner allowed local court to harass a citizen for saying "go back to Lakewood". Again, no such vague statement can conceivably constitute a crime overriding a well established law of First Amendment.
- 111. Rabner publicly whined on numerous occasions decrying ICE performing its duties by deporting illegal alien criminals (such as Mehany and Akkan).

Count 18

Defendant Murphy violated Equal Protection under 14th Amendment by protecting illegal aliens via his Sanctuary State policy.

112. Since illegal aliens are expressly forbidden to be present in the US, they cannot be provided same state services as Plaintiff. This includes illegal aliens who fraudulently claim political asylum while not qualifying for such a status. Defendant Murphy allowed illegal aliens to obtain driver licenses, and provided millions of public money in handouts. That includes to psychopath Defendant Mehany.

Count 19

ICE is negligent by not detaining and removing from the United States an illegal alien Defendant Mehany and illegal aliens employed by Onkar Singh Defendants and others in Hudson County.

113. ICE does not provide sufficient manpower and finances for local enforcement in Hudson County, thus 95% of workers at publicly subsidized construction sites in Hudson County are illegal aliens. Publicly subsidized construction sites in Jersey City constitute about 95% by itself. Therefore, crooked contractors are effectively guaranteed impunity.

Count 20

Civic Plus censorship of Plaintiff's formal complaints submissions to Jersey City constitutes gross negligence and also violates Due Process under 14th Amendment on part of Jersey City, Steven Fulop and Peter Baker.

116. Civil Plus is a contractor (vendor) for Defendant Jersey City who operates website through which citizens can file formal complaints with Jersey City. At an unknown date Defendant Civic Plus singled out Plaintiff and decided to subject his submissions to its own censorship, whereas complaints are delayed for hours and sometime even not let be posted and forwarded to proper Jersey City agency to be processed. That includes important public safety complaints which require immediate action. Censorship is subject to arbitrary and capricious interpretation of their own so called "Terms of

Service". No private third party can insert itself between a citizen and a government entity and decide on its own which and when formal complaints are allowed to be provided to such government entity. Any such "Terms of Service" are a legal garbage written by dumb and fake lawyer. It is also true for Defendant Peter Baker, who as City corporate counsel, approved it and allowed it to be implemented at public expense.

117. Civic Plus contract allowing itself to censor Plaintiff was approved by Defendants Fulop and Baker. Therefore, they both liable for Plaintiff's Due Process violation.

Count 22

Steven Fulop and Peter Baker breached fiduciary duty, and Jersey City is grossly negligent by waiving Due Diligence investigations and reports on tax abatement applicants, and construction permits applicants, including mega-fraudster Onkar Singh Defendants applications.

118. This claim includes cases where other persons then Sing filed applications for tax abatements and construction permits, including via sham LLCs. In order to facilitate bribes, Fulop and Baker employ a technique of waiving and not requiring mandatory Due Diligence investigations. Borat Kuldeep Kumar was a contracted partner at 3224 Kennedy prior to tax abatement application and a twice convicted fraudster. Also, asbestos was present at this location and removal required special action. Fulop and Baker waived an investigation in order to keep this off the record. Same happened time and again at different locations for which Onkar Singh Defendants applied for tax abatements and construction permits. It is so rampant, that Fulop and Baker waived Due Diligence for most applicants, including a well known convicted fraudster from Israel.

Count 23

Gross negligence by National Construction Rentals by illegally placing temporary fences on public right of way and in violation of Jersey City and Hudson County zoning laws and NJ Uniform Construction Code. Also, ADA violations occur by such actions.

- 119. National Construction Rentals is a corporation which rents and installs temporary fences for contractors and developers in Hudson County around construction sites. There are dozens installed at any given time. It rented numerous fences to Onkar Singh Defendants. Pursuant to current corporate policy almost all these fences are installed on public right of way, thereby violating Plaintiff's and his fellow citizens unlimited access to public spaces. At no time National verifies property lines before installing, and installs visibly on public sidewalks to allow crooked contractors an additional working space without obtaining sidewalk/street closures permits. National also, never demands their customers verify propriety lines.
- 120. Also, despite numerous previous personal injury lawsuits by passing strangers over the years, National uses cheap horizontal footings to hold fence sections vertical, which extends at ground level even further onto public right of way. These are unlit at night.

Count 24

Jersey City gross negligence by allowing Fulop, Metro, Meyer, Metro and Shea illegally waiving all

asbestos removal restrictions.

121. There are countless structures containing asbestos in Jersey City. That includes asphalt-asbestos siding and cement-asbestos siding used on houses decades ago. Also, pipe insulation. Removal is highly regulated by United States and State of New Jersey. Defendant Fulop, Shea, Metro and Meyer allow Onkar Singh Defendants and all contractors at large to remove and dispose of asbestos in clandestine manner, without consideration of any laws, including OSHA, nor health safety of the public. Plaintiff caught Borat Kuldeep Kumar criminally removing and disposing of asbestos at 3224 Kennedy. At this location, Onkar Singh defendants exposed children at Middle School 7 across the street to asbestos for days on end. Following Plaintiff's complaint to State of New Jersey, Meyer was forced to issue stop work order. Twice, because Borat would not comply. In order to fool Plaintiff, Borat commissioned a banner stating that asbestos was removed legally and placed on the fence.

Count 25

Dollar Tree grossly negligent by using public street and sidewalk as private loading dock.

122. Dollar Tree opened store at 3000 Kennedy despite of not having a loading dock, and having no curb parking in front nor on side of it. As a corporate policy, twice a week large trucks illegally driving against the traffic on narrow side street where trucks are prohibited. Then, for 2-3 hours portable conveyor belt is deployed blocking street and sidewalk at very busy intersection, forcing people onto the pavement between passing cars.

Such activity is is rampant and occurs 7 days a week, including at Patel Brothers store on Newark Avenue (this will be addressed separately).

Count 26

Gross negligence by Jersey City and Steven Fulop by appointing and then reappointing a twice convicted fraudster Borat Kuldeep Kumar to a City government position.

123. Appointments violated fiduciary duty, since Borat's long criminality was a public knowledge before appointments. In addition, City and Fulop failed to remove Borat when Plaintiff notified about criminal asbestos removals at numerous sites. Also, City and Fulop failed to remove Borat when New Jersey Department of Labor found Borat guilty of wage theft from slave laborers and illegal aliens.

Count 27

Edgar Martinez grossly negligent by renting to Borat Kuldeep Kumar patrolman Christopher Vasquez as mob enforcer.

124. Due to Plaintiff's efficiency in investigating Fulop's Tax Abatement Racket, Onkar Singh Defendants became desperate to stop his activities. Borat rented from Martinez (then commander of local precinct) patrolman Vasquez and ordered him to harass Plaintiff by filing fraudulent citations. Vasquez was allowed by Martinez to use police uniform while off duty to pretend that harassment is an official police act. At one point, a court date came along while fake victim Borat was not able to attend due to him vacationing oversees. Therefore, Borat called Vasquez on latter's personal cell phone and

approval of said Abad.

ordered to perform duties of a judge (one Carlo Abad) and excuse absence. This happened with

Count 28

Onkar Singh Defendants practice age and race discrimination in violation of Age Discrimination in Employment Act.

- 125. Onkar Singh directly and via his business partners and sham LLCs is engaged in industry affecting commerce and employs more then 20 workers at any given time since 2016. That includes trafficking across state lines and employing illegal aliens/slave laborers. Also, obtaining fake car insurances and registrations in other states for use on New Jersey construction sites.
- 126. Defendant Singh refused to comply with numerous tax abatements contracts with Jersey City, in part because Plaintiff was over 40 years of age and White. Defendant Singh, Borat Kuldeep Kumar and Arvinder Minhas are rabid racists themselves who are not qualified to obtain city contracts on that account alone. They discriminate against Blacks even more then Whites. There are almost no Black workers at their projects, despite of comprising over 21.5% of Jersey City population, according to US Census Bureau. When caught dumping asbestos and hiring illegal aliens, they tried to accuse Whistleblower of racism with a hoax, instead.

Count 29

Onkar Singh Defendants practice age and race discrimination in violation of New Jersey Law Against Discrimination, NJSA 10:5-4.

127. Onkar Singh directly and via his business partners and sham LLCs discriminated against Plaintiff since 2016 by refusing contracted employment due to Plaintiff being of age over 40 and being White. This includes other Onkar Singh Defendants.

Count 30

Jersey City and Steven Fulop are grossly negligent by allowing Onkar Singh Defendants to rig the housing market in Sparrow Hill and elsewhere in Jersey City making housing unaffordable.

128. These Defendants owe Plaintiff no duty of any kind to secure affordable housing... until the very moment they subsidize Onkar Singh Defendants in the amount of more then \$ 0.01. As a result of Fulop's Tax Abatement Racket and under his tenure as mayor, Jersey City became one of top most expensive cities to live in the entire US. Under current scheme, developers substitute property taxes by scarp payments to City funds, while allowed rigging housing market where residents will fall behind in affordability by design. For instance, publicly subsidized apartment building at 3 Journal Square erected by local apparatchik rents apartments for \$5700 per month. In addition, fraudster building

inspector Meyer faked inspections there and allowed there illegally skip fire-stops in outer cladding, creating this structure like deadly Grenfell Tower in London. Prior, local rents there were around \$800 per month.

129. Due to rigging housing market and unaffordability, number of illegal dwellings (mostly death traps) increased from 20 000 to over 60 000 just under Fulop's tenure. Also, homeless children population grew, while Fulop lined his pockets with bribes and built a summer house near Rhode Island beach on a single government salary. Under current City policy, in the end, "affordable" housing is assigned by overcrowded lottery and Plaintiff has better chance affording housing by playing NJ lottery by himself. 3224 Kennedy, 125 Lake, 138 Lake and 221 Liberty are examples of Onkar Singh Defendants rigging housing market in Sparrow Hill.

Count 31

Jersey City is grossly negligent by using blight law to allow Onkar Singh Defendants and others to rig the housing market (aka Fulop's Tax Abatement Racket).

- 130. Due to heavy industrialization of Jersey City throughout most of its modern history, the Great Depression of 1930'-1940' took heavy toll with large number of abandoned and irregularly shaped small properties. To address cities plight, in 1947 New Jersey held Constitutional Convention where local tax exemption incentive was allowed and subsequent laws passed. That law was split later on and local property tax exemption was more redefined as a stand alone act NJSA 40A:20-1 et seq. known as "Long Term Tax Exemption Law". It still says in paragraph 2 that sole purpose is to address investment in "elimination of blighted condition". This law was never meant to be a vehicle for investment scam for investors located in India (in case of Onkar Singh Defendants). In order to apply that law, Jersey City uses the imaginary magic wand and declares all properties "in need of development" without explaining what that "need" actually is, without blight actually existing, let alone declaring one via proper ordinance.
- 131. Under such circumstances, Onkar Singh Defendants obtained from Jersey City multiple tax abatements (exemptions) including for 3224 Kennedy. Every single one is void due to lack of existing and declared blight and vagueness of "need of development" phrase.
- 132. Also, void is a tax abatement given to proprietors of 360 County Road development (Defendant Unanue, via Goya Foods, Inc.). This property could not even have been blighted since at the time it was a swamp in middle of the Meadowlands saltwater tidal marshes.
- 133. Jersey City still could have entered into tax exemptions agreements under common law, but did not do so.
- 134. None of the above tax abatements included mandatory Due Diligence investigations and reports. When Plaintiff inquired at city council meetings, he was lied to many times, assuring that Due Diligence were performed every single time.
- 135. Jersey City is also grossly negligent by not having an ordinance establishing tax exemptions

policy and not having Internal Review Committee. Both mandated by the State of New Jersey.

Count 32

- 42 USC 1983 against Jersey City, Fulop and Baker for violating Plaintiff's Due Process under 14th Amendment by failing to cause public notices of public hearings at sites in question. Also, public comments at public hearings are limited to 3 minutes.
- 136. To hide Fulop's Tax Abatement Racket from the public, none of the tax abatements and zoning applications include public notices of public hearings placed at sites in question. That includes public notices of required traffic studies, shade from new buildings studies, and social impact (on housing) of new developments studies. That includes public notices of mandatory compliance of Onkar Singh Defendants with OSHA, public safety during construction activities, and noise pollution.
- 137. Jersey City is likely the only large city in whole USA that practices this type of concealment fraud. Currently, City utilizes tools defined in NJSA 40:53-2 which are ineffective to reach the citizens interested the most: the locals living next door.
- 138. Defendant Baker is incompetent by believing that above statute is sufficient and replaces Due Process under 14th Amendment. Under Constitutional Supremacy Clause, NJSA can never replace 14th Amendment. Public notices requirement under NJSA only supplements public notices requirement under 14th Amendment.

Count 33

- 42 USC 1983 against John Hallanan for violating Due Process under 14th Amendment by routinely violating 7 days compliance with Plaintiffs OPRA requests.
- 139. Defendant Hallanan is a Jersey City custodian of records for the purpose of compliance with New Jersey Open Public Records Act. Plaintiff's technique of dealing with Fulop's criminality is to investigate a given subject and at the end making an OPRA request to confirm his findings. To prevent Plaintiff exposing Fulop's corruption, a technique of sabotaging requests is employed by Jersey City. Defendant Hallanan routinely refuses to produce specific records and self exempts himself from 7 days compliance for weeks on end.

Count 34

42 USC 1983 against Fulop, Shea and Meyer for violating Due Process and Equal Protection under 14th Amendment by blocking Plaintiff's emails.

140. These Defendants were provided email accounts paid for by Jersey City to communicate with constituents. Plaintiff successfully corresponded with Defendants via emails, until they realized that he actually creates multiple public records of their own criminal activities. Thereafter, at an unknown date, all three Defendants blocked Plaintiff's email address to prevent him from doing so.

Count 35

Due process violation by OSHA under 5th Amendment,

141. Defendant OSHA Parsippany Area Office investigates and issues fines to crooked contractors operating in Hudson County for violating OSHA safety standards. Onkar Singh Defendants are prolific violators and Plaintiff reported them and many others multiple times. Current policy of OSHA Regional Office is to dispatch own investigator to observe violations in person and then proceed with fines. Typical turnover is one business day, at which point offenders move on to another place and offense, guaranteeing impunity in the process. Current policy excludes initiating proceeding with evidence provided by Plaintiff alone. That includes cases where video and photo evidence is provided upfront. Policy also prohibits using OSHA's existing subpoena powers to follow up on Plaintiff's complaints. Such a policy clearly violates his Due Process.

Count 36

Jersey City Board of Education violates Plaintiff's Equal Protection under 14th Amendment by policy of illegally parking school busses on public streets.

142. Plaintiff complained numerous times over the years about school busses illegally parking at deadly intersection at St Paul's and Kennedy Blvd. despite of having dedicated large off road private parking lot. This also occurs at numerous other school in Jersey City. Board refuses to comply with existing laws and keeps policy in place and keeps endangering the public for the sole reason of convenience.

Count 37

DeSoto violated Plaintiff's Due Process under 14th Amendment by allowing Hudnut and Sanchez to proceed to trials while concealing exculpatory evidence of 4 videos, and by not prior reviewing herself a legal standard of self defense.

143. Psychopath Mehany had misfortune of attempting to murder Plaintiff at a busy train station, thus his deed was captured on multiple CCTV. However, that ruined Hudnut's and Sanchez's narrative protecting an illegal alien and attempting to frame Plaintiff instead. So they instead opted to substitute this evidence with body cams video made after the event (which they ended up not providing to Plaintiff anyway). They lied to court that they did. In order to advance their scam, they concealed existence of actual event CCTV videos. Only after Plaintiff protested on record at two sham Se Soto's attempted "trials", they claimed to make effort to retrieve it (which they did not). This all happened with approval of DeSoto, whose duty as judge was to prevent known concealment of evidence.

DeSoto also had a duty to review standard of self defense prior to allowing trials, however she knew that it would ruin her Woke ideology of protecting an illegal alien, thus she did not perform her duty.

Count 38

Defendant Silva Construction and Demolition grossly and criminally negligent by illegally participating in asbestos removal and hauling in Hudson County.

144. Since at least 2016, Defendant Silva knowingly removes and hauls asbestos from Onkar Singh's and other construction sites, in violation of 40 CFR 61.145. First observed was site at 3224 Kennedy near Middle School 7 in 2016 and the latest in 2024 was 3045 Kennedy near Public School 31 and near Golden Door Charter School. Children were exposed to asbestos at all three locations. Plaintiff documented dozens sites in between this period of time. Onkar Singh and Silva's co-conspirators are Fulop, Shea and Meyer.

Count 39

Third party claim of breach of tax abatement contract of Robert I. Unanue with Jersey City.

145. Robert I. Unanue tax abatement (tax exemption) contract for 360 County Road mandated priority in hiring of Jersey City residents during construction and post construction. As per actual business plan, it never happened. In fact, to operate warehouse post construction, Defendant Unanue relies almost entirely on illegal aliens/slave laborers employed via staffing agency called On Target Staffing LLC located at 362 Central Ave., Jersey City. Illegal aliens by default are prohibited working in the US, thus cannot be considered legal local residents. This way, Unanue not only defrauds Jersey City by enjoying undue massive tax exemption, but also gains massive profits by "saving" taxes due to IRS, NJ Treasury, social security, NJ unemployment insurance and NJ workers compensation insurance. Plaintiff claims injury of not being able (and refusing) to compete with illegal aliens/slave laborers.

Count 40

Hudson County

146. Hudson County grossly negligent by allowing unlimited sidewalk/street closures without compensation, and by allowing unlimited clandestine asbestos removal. Also, Hudson County is liable for injuries caused by crooked judges Galis-Menendez and Rodriguez.

Count 41

NJ Attorney General negligent by not maintaining public list of perjurers.

147. As far as society at large is concerned, there is no difference in social impact between pedophiles and perjurers. While State of New Jersey maintains registry of pedophiles, perjurers are given free pass. Defendant Minhas turned to abhorrent acts of perjuries against Whistleblower M.Kulowski in order to cover-up his criminal asbestos dumping on children at Middle School 7. Two county judges were his willing co-conspirators. Defendant Suarez already maintains a secret "do not call" list of policemen

caught perjuring themselves, which she refused to produce upon Plaintiff's OPRA request. Such list must be turned into mandatory registry, maintained at state level and made public, just like pedophiles' registry. Plaintiff demands list be named "Arvinder Minhas Registry of Perjurers".

Count 42

148. Defendant Rabner grossly negligent by allowing Defendant Gingerelli aka The Fat Legal Bimbo to use in official filing and made public Plaintiff's social security number without his consent.

Count 43

Defendant Abad liable for Plaintiff's civil right abuse as municipal court judge. Abad liable to be disbarred and removed from state pension system.

149. Defendant Abad assigned to himself several fake complaints filed by Borat Kuldeep Kumar against Plaintiff for sole purpose to intimidate him into ceasing exposing Borat's involvement in Fulop's Tax Abatement Racket and dumping of asbestos on children at Middle School 7. Abad knew that all along that Plaintiff violated no laws. At one time, Abad even allowed patrolman Vasquez to perform his judicial duties and excuse Borat's absence due to vacationing oversees.

VI. RELIEF

- 150. Order directing New Jersey Attorney General to establish and maintain publicly accessible over the Internet registry of perjurers called "Arvinder Minhas Registry of Perjurers".
- 151. Order placing the following Defendants on said registry: Arvinder Minhas as perjurer and Christopher Vasquez as perjurer and accomplice. Following rest as accomplices: Onkar Singh, Borat Kuldeep Kumar, Edgar Martinez, Esther Suarez, Angela Gingerelli aka The Fat Legal Bimbo, Stuart Rabner, Mitzy Galis-Menendez, Nesle A. Rodriquez, Karen DeSoto, Jacob Hudnut, Sujey Sanchez.
- 152. Order Hudson County Superior Court to refrain from using anyone's social security numbers unless it is related to actual services of Social Security Administration and is expressly permitted by number holder.
- 153. From Defendants Jersey City, Hudson County Superior Court, Suarez, Gingerelli and Rabner \$100 000 each in both compensatory and punitive damages for publishing Plaintiff social security number without his consent. Also, order allowing Plaintiff to publish social security numbers of these defendants.
- 154. Order revoking law licenses (disbarring) the following Defendants: Peter Baker, Jacob Hudnut, Sujey Sanchez, Karen DeSoto, Esther Suarez, Angela Gingerelli aka The Fat Legal Bimbo, Stuart Rabner, Mitzy Galis-Menendez, Nesle A. Rodriquez, Carl Abad,
- 155. Order of removal of following Defendants from respective New Jersey pension systems under NJSA 43:1-3: Peter Baker, Steven Fulop, Warren K. Curtis, James Shea, Edgar Martinez, Raymond Meyer, Jacob Hudnut, Sujey Sanchez, Karen DeSoto, Christopher Vasquez, Edgar Martinez, Esther

Suarez, Angela Gingerelli aka The Fat Legal Bimbo, Stuart Rabner, Phil Murphy, Mitzy Galis-Menendez, Nesle A. Rodriquez, Monte Zucker, John Metro, John Hallanan, Carl Abad.

- 156. Order of termination of employment of following Defendants: Peter Baker, Steven Fulop, Warren K. Curtis, James Shea, Edgar Martinez, Raymond Meyer, Jacob Hudnut, Sujey Sanchez, Karen DeSoto, Christopher Vasquez, Edgar Martinez, Esther Suarez, Angela Gingerelli aka The Fat Legal Bimbo, Stuart Rabner, Mitzy Galis-Menendez, Nesle A. Rodriquez, Monte Zucker, John Metro, John Hallanan, Carl Abad,
- 157. Order declaring that Onkar Singh concealed being a rabid racist against Whites and Blacks, thus was never legible to be admitted into US via Port of Entry, and subsequently was not legible to obtain any legal residency therein. Also, order to deport him back to India.
- 158. From Onkar Singh: compensatory back pay for work contracted via tax abatement at 3224 Kennedy Blvd, Jersey City, in the amount of \$ 250 000 per annum effective October 2016 plus additional four fold per annum in punitive damages, that is \$ 1 000 000. Period to be covered is up to Plaintiff's retirement age of 70. Plaintiff demands all appropriate payroll taxes be withheld on base amount and forwarded to appropriate agencies, including social security taxes. Plaintiff will accept payment via LLCs. Plaintiff demands that all dues be satisfied from consecutive LLCs in which this Defendant has interest. Also, Plaintiff demands Court awards Singh's house located at 37 Imperial Court in Monroe, NJ, to be turned over to him as an additional punitive damages.
- 159. From Onkar Singh: payment of all taxes due calculated on reasonable prevailing rate which he would have to pay workers had he not employ illegal aliens/slave laborers. These taxes to be paid to IRS and NJ State Treasurer. Also, \$ 2 000 000 lump sum to NJ unemployment insurance, \$ 2 000 000 lump sum to NJ workers compensation insurance and \$ 17 000 000 lump sum to Social Security Trust Fund.
- 160. From Onkar Singh Defendants including Castro and Parekh \$ 1 000 000 each in compensatory and punitive damages for unfair competition.
- 161. Form Onkar Singh, Borat Kuldeep Kumar, Arvinder Minhas and Minions 1-10 compensatory and punitive damages for noise pollution in the sum of \$ 1 000 000 each.
- 162. Permanent injunction ordering Port Authority strictly enforce e-bikes ban anywhere on PATH premises, including trains. That includes mandatory impounding.
- 163. From IRS and NJ State Treasury finding fee of 25% of sums assessed to Onkar Singh Defendants.
- 164. From Borat Kuldeep Kumar for Assault #3 compensatory damages in the sum of \$ 10 000 and punitive damages in the sum of \$ 100 000.
- 165. For defamation, from Defendants Hudson County, Jersey City, Onkar Singh, Arvinder Minhas, Borat Kuldeep Kumar, Mitzy Galis-Menendez, Nesle A. Rodriquez, Christopher Vasquez compensatory and punitive damages in the sum of \$ 1 000 000 each.
- 166. For defamation, from Defendant Rabner compensatory and punitive damages in the sum of \$ 15

- 000 per day from day of indictment of Plaintiff for non existing crimes (a ho
- 000 per day from day of indictment of Plaintiff for non existing crimes (a hoax). No less, however, then \$ 1 000 000. These damages are to be paid out of his own pocket.
- 167. Order of permanent injunction directing Jersey City to crack down on illegal dwellings. This crack down to be pre approved by this Court and supervised by Plaintiff.
- 168. Order of permanent injunction directing Jersey City to crack down on illegal street/sidewalk closure. Also illegal encroachment on public right of way by illegal gates and fences.
- 169. Order of permanent injunction prohibiting any construction site in Hudson County to operate without installation of prior temporary electrical service line.
- 170. Order of permanent injunction directing Jersey City to use e-verify program to verify all workers on publicly subsidized sites. All workers are to be pre approved week in advance and record kept by the City.
- 180. From Hudnut, Sanchez and DeSoto, compensatory and punitive damages in the sum of \$ 100 000 each to be paid out of their own pockets.
- 181. Order of permanent injunction directing Jersey City and Hudson county to comply with ADA. Plan to be pre approved by this Court and supervised by Plaintiff. All illegal fences and cars must be impounded.
- 182. Order of permanent injunction directing Jersey City restore debarment (blacklisting) program for crooked contractors. Program to be approved by this Court.
- 183. Order of permanent injunction directing Jersey City to increase time for public comments per person from 3 minutes to unlimited.
- 184. Order of permanent injunction directing Jersey City and Hudson County to develop standard Safety Mitigation Plans for construction sites. Safety Mitigation Plans to be posted at sites 3 weeks before commencement of work.
- 185. Order of permanent injunction directing Jersey City to post public notices about hearing at sites. Standards notices to be approved by this court.
- 186. Order of permanent injunction directing FBI to assign sufficient manpower and funds to deal with corruption of Fulop and in Hudson County.
- 187. Order of permanent injunction directing EPA reviewing concealed volumes of discharges bypassing existing permanent injunction.
- 188. Declaration of NJSA 2C:16-1 (hate crime) unconstitutional.
- 189. From Defendant Murphy, for dumping and protecting criminal illegal aliens in Jersey City, order turning over his house in Tuscany, Italy, to Plaintiff as punitive damages.

- 191. Order of permanent injunction directing ICE to crack down on illegal aliens employed by Onkar Singh Defendants and on other publicly subsidized construction projects in Jersey City.
- 192. Declaration of all Jersey City tax abatements ordinances issued after January 1, 1990, which had no prior Due Diligence reports, void. Beginning with 3224 Kennedy.
- 193. Declaration of all Jersey City tax abatements ordinances issued after January 1, 1990 without blight existing and without blight being declared via ordinance, void.
- 194. From National Construction Rentals, compensatory and punitive damages in the sum of \$ 1 000 000. Also, order of disgorgement of profits obtained from fences illegally placed on public right of way obtained after January 1, 2000.
- 195. Order of permanent injunction directing Jersey City and Hudson County to create inventory of structures containing asbestos. Order to implement protocol to abate during demolition compliant with pertinent CFR regulations.
- 196. From Singh, Parekh, Borat and Minhas, for exposing Plaintiff to asbestos, compensatory and punitive damages in the sum of \$ 1 000 000 each.
- 197. Order of permanent injunction directing Jersey City to revoke business license for Dollar Tree, and order to close this store for lack of loading dock.
- 198. Declaration of appointment of Borat to Jersey City government position, void.
- 199. Order of permanent injunction debarring (blacklisting) Onkar Singh for age and race discrimination. This includes all LLC in which he has interest.
- 200. From Hallanan, compensatory and punitive damages in the sum of \$ 10 000 per OPRA violation, no less then \$ 100 000. To be paid out of his own pocket.
- 201. From Shea, Fulop and Meyer, for blocking emails, compensatory and punitive damages in the sum of \$ 100 000 each. To be paid out of their own pockets.
- 202. Order of permanent injunction directing OSHA to retrospectively investigate and prosecute all complaints submitted by Plaintiff based on evidence provided by him and without inspector actually witnessing violation.
- 203. Order of permanent injunction directing JC Board of Education to obey existing traffic laws, including prohibition of parking and using vehicles alarm horns as door bells. Also, order to pay Plaintiff \$ 10 000 per each violation thereafter.
- 204. From Unanue, disgorgement of all the gains obtained from substituting American workers and

local residents with illegal aliens/slave laborers. That includes payment of all back taxes.

205. Order ICE to deport Defendant Mehany to his place of origin.

206. All other relief Court finds just.

207. Court costs and attorney fees.

M.Kulowski.

December 16, 2024